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Magalie R. Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)
Policy Division
Wireless Telecommunications Bureau**

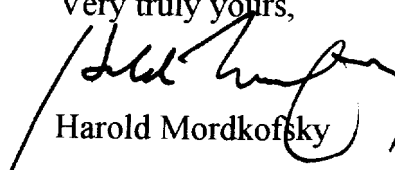
**Re: 3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
Report on Implementation of Wireless E911
Phase II Automatic Location Identification
CC Docket 94-102**

Dear Ms. Salas:

On behalf of 3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless, we are submitting herewith its report on implementation of a wireless E911 automatic location identification system.

Please direct any questions or correspondence regarding this filing to our office.

Very truly yours,


Harold Mordkofsky

Attachment

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**3 RIVERS PCS, INC.
d/b/a 3 RIVERS WIRELESS
1211 Northwest Bypass
P.O. Box 3387
Great Falls, Montana 59403-3387**

Magalie R. Salas, Secretary
Federal Communications Commission
Washington, DC 20554

**Attention: Patrick Forster, Senior Engineer
Policy Division
Wireless Telecommunications Bureau
3-A104**

**Re: Report on Implementation of Wireless E911
Phase II Automatic Location Identification
CC Docket 94-102**

Dear Ms. Salas:

In accordance with the Commission's *Third Report and Order*, in CC Docket 94-102, released October 6, 1999, as modified by the Commission's *Fourth Memorandum Opinion and Order*, released September 8, 2000, we hereby submit this report of our plans for implementing a wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) system, as follows:

Background/Contact Information

1. Carrier Identifying Information:

Name of Carrier: 3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
TRS Number: 805679

2. Contact Information:

Any inquiries concerning this report may be referred to:

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2120 L Street, N.W.
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3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3RW) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3RW a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3RW utilizes Nortel's CDMA equipment for its PCS network.

E911 Phase II Location Technology Information

1. Type of Technology: 3RW presently intends to implement a handset-based technology solution utilizing a network server from SnapTrack, Inc. and handsets from Kyocera, Nokia and Motorola. This technology will be used over 3RW's entire network.
2. Testing and Verification: Thus far, 3RW has not performed any testing. The products described above have not been released and therefore testing has not been feasible. When the equipment becomes available, 3RW will begin testing by first segregating its service area into multiple environments (urban, suburban, rural flat land and rural mountainous). Test calls will be placed from various locations, including stationary locations, inside and outside of buildings, and mobile locations. Location information will be compared to handheld GPS readings. Testing will be coordinated with local PSAPs. All testing will be in accordance with the Commission's *OET Bulletin No. 71*, or equivalent methods and procedures established by the equipment manufacturers.
3. Implementation Details and Schedule: 3RW plans to adhere to the implementation schedule established by the Commission in the *Fourth Memorandum Opinion and Order*. Its ability to do so will depend, in large part, on the ability of the equipment manufacturers to have their products operational and delivered on time. 3RW has requested location technology status from its handset suppliers. However, none has been able to commit to a schedule.
4. PSAP Interface: A communications link will be established from 3RW's SnapTrack server to the ALI database of the local PSAPs. The voice portion of the call will be routed to the appropriate trunks, as usual. The location information will be sent via the communications link to the PSAP's ALI database along with the number of the E911 caller.

5. Existing Handsets: 3RW will continue to keep abreast of its current handset suppliers' location identification deployment plans. These suppliers currently include Nokia, Kyocera and Motorola. 3RW's subscribers will be informed beginning in 2001, by way of bill inserts, of the coming availability of ALI-capable handsets and given the opportunity to acquire them when available. Subscribers will also be informed of the December 31, 2005 date by which basically all handsets used must be ALI-capable.

6. Location of Non-Compatible Handsets: Beginning with the October 1, 2001 date for starting to sell and activate ALI-capable handsets, 3RW will tout their advantages to new subscribers and recommend that non-compatible handsets be restricted for use at campus locations, i.e, indoor locations in manufacturing plants and elsewhere where they will be used basically for fixed service. 3RW will use a "best practices" approach in connection with providing ALI to non-compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II ALI data. It appears that such solutions are currently in development and, at this stage, 3RW is not committed to any particular solution.

7. Other Information: 3RW has reviewed several options for providing E911 Phase II ALI service. Its network supports approximately 5,000 users with plans to grow to 8,000 over the next three years. Geographically, its licensed service area covers about two-thirds of the state of Montana. The network overlay solution does not seem to fit the very rural model that 3RW has used to deploy PCS. The "time difference of arrival" and "angle of arrival" approaches rely on triangulation methods and the timing to and from the base station and handset. To use triangulation methods, a handset would always have to be in communications range of multiple base stations. Due to the way our system is constructed, this is generally not possible. When repeaters are used to extend the reliable communications range of base stations, it is our understanding that time differential results are skewed. Since 3RW extensively uses repeaters to provide service in areas that would otherwise be without service, the network overlay solution is not attractive


Nortel Networks, 3RW's infrastructure provider, has not yet provided information as to the availability of the needed feature sets for the Base Transceiver Station, Base Station Controller and the DMS 100 Dual-Load Switching Platform. They cite the lack of standards for E911 Phase II compliance. A network solution would require the addition of costly equipment at all base station and repeater sites. 3RW has calculated its capital expense for a network-based solution to be between \$1.75 million

and \$2.25 million, which it regards as prohibitive, especially in the absence of any cost recovery mechanism.

As of the present, 3RW has received only one Phase I request and no Phase II requests. In the case of the Phase I request, the PSAP involved has now concluded that it is not technologically ready for implementation. 3RW continues proactively to work with this PSAP to implement Phase I E911 service. 3RW has also had conversations with the statewide 911 Program Manager and has been proactive in seeking a coordinated deployment of wireless E911 (Phases I and II) by all carriers on a statewide basis.

Respectfully submitted,

3 Rivers PCS, Inc. d/b/a
3 Rivers Wireless

By 
Officer

Dated: November 8, 2000